



USDA Privacy Impact Assessment (PIA)

Consolidated Tobacco System

CTS

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UNITED STATES DEPARTMENT OF AGRICULTURE
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1.0 Introduction

The USDA is responsible for ensuring the privacy, confidentiality, integrity, and availability of customer and employee information. Privacy protection is both a personal and fundamental right of USDA customers and employees. Among the most basic of customers and employees' rights is an expectation that USDA will protect the confidentiality of personal, financial, and employment information. Customers and employees also have the right to expect that USDA will collect, maintain, use, and disseminate identifiable personal information and data only as authorized by law and as necessary to carry out agency responsibilities.

The Privacy Impact Assessment (PIA) is a process used to evaluate privacy concerns and safeguards in computer application systems. The PIA should be initiated in the early stages of the development of a system and completed as part of the required System Life Cycle (SLC) and security reviews. Privacy is one component of system confidentiality and must be considered when requirements are being analyzed and decisions are being made about data usage and system design. A PIA describes the system and its data, any specific privacy concerns, and safeguards established to meet privacy needs. The USDA Privacy Coordinator must be involved in the PIA process.

1.1 System Description

The Consolidated Tobacco System processes data that is associated with burley tobacco, flue cured tobacco, tobacco lease and transfers, and other tobaccos. PC users at the County offices access the AS/400 system, and send and receive relevant tobacco marketing data via the NITC mainframe. The NITC mainframe processes data into reports and stores it on their internal SQL server.

2.0 Privacy Impact Questionnaire

2.1 System Data

1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.	Customers.
2a. What are the sources of the information in the system?	NITC Mainframe, AS/400-A/36
2b. What USDA files and databases are used? What is the source agency?	FSA Flat Files

2c. What Federal Agencies are providing data for use in the system?	FSA
2d. What State and Local Agencies are providing data for use in the system?	FSA County Service Centers
2e. From what other third party sources will data be collected?	None
2f. What information will be collected from the customer/employee?	All data is collected directly from the customer and employees.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Data will be verified against other reports.
3b. How will data be checked for completeness?	Data will be verified against other reports.

2.2 Data Access

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	Users, System Administrators, Managers
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Association representative, government employee assigned to task. Many have been on system since concept.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	Access is restricted based on county. Must have administrator rights to change passwords, etc.
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Passwords.

5a. Do other systems share data or have access to data in this system? If yes, explain.	No
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	Government employees maintain privacy of the data.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, and Other)?	The data is not directly shared. The data is sent to the system in flat files, and then extracted for report creation.
6b. How will the data be used by the agency?	
6c. Who is responsible for assuring proper use of the data?	John Truluck

2.3 Data Attributes

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	No
2b. Will the new data be placed in the individual's record (customer or employee)?	No
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	No
2d. How will the new data be verified for relevance and accuracy?	Cross checks to other reports.

3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	System security provisions
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Yes - Changing passwords, new passwords, call back features of routers to associations, password verifications, system monitoring
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	The user must login with ID and password to access data.
4b. What are the potential effects on the due process rights of customers and employees of: <ul style="list-style-type: none"> consolidation and linkage of files and systems; derivation of data accelerated information processing and decision making; use of new technologies. 	The biggest potential effect occurs when the FOIA group sends raw data (excluding social security number and farm number, etc.) in response to requests from various organizations.
4c. How are the effects to be mitigated?	Unknown at this time.

2.4 Maintenance of Administrative Controls

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	All users access and use the same software system.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	Modifications and upgrades to the Service Center software is distributed using a well established procedure to all Service Centers on a timely basis.
2b. Explain any possibility of disparate treatment of individuals or groups.	None.
2c. What are the retention periods of data in this system?	The retention periods used are those established as standard for both the A/36 and the NITC mainframe.

2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Standard procedures are used, as documented in various handbooks.
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	There are checks and balances that are kept within the system to make sure the data is relevant.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	No
3b. How does the use of this technology affect customer/employee privacy?	Not applicable.
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	No.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No
4c. What controls will be used to prevent unauthorized monitoring?	Those established in the county Service Centers.
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	N/A
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	N/A

3.0 Summary

This assessment describes the privacy concerns of the Consolidated Tobacco System infrastructure and its data. As privacy is one the components of system confidentiality this PIA must be considered anytime requirements are being analyzed and decisions are being made about data usage, security and system design.